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6 Representing the United States of America

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 United States of America,

10 Plaintiff,

11 v.

12 Daniel Plata a/k/a/ "Velor",
Jonathan Pavon a/k/a "Cluer"

13 Defendants.
14

Case No. 2:20-cr-00032-JCM-EJY

MOTION FOR A PROTECTIVE
ORDER GOVERNING DISCOVERY

15 The Government and the indicted Defendants in the above-captioned case, by and
16 through their respective attorneys of record, respectfully moves the Court to enter an order
17 governing disclosure of certain discovery material pursuant to Fed. R. Crim. P. 16(d). The
18 parties' request is outlined below.

19 IT IS THEREFORE ORDERED that:

20 1. In order to protect sensitive information regarding certain historic properties
21 from disclosure to the public when such disclosure could result in a significant damage to
22 the historic property, such as damage to the integrity of the site by the removal of artifacts

1 or defacement, or impede the use of a traditional religious site by practitioners and to en-
2 courage early, broad and expansive discovery in this case, the defendants, the defendants'
3 attorneys of record, and their respective staff members and others retained to work on the
4 case:

5 a) shall not distribute any information provided by the Government regard-
6 ing regarding the location or other specific identifiers of the site identified by the United
7 States Department of the Interior as site 26LN210.

8 2. Any filing or pleading that has as an attachment a protected document or
9 which contains protected information from a protected document shall be filed under seal
10 and copies sent by email to the other parties, unless the Government agrees that the materi-
11 als may be filed publicly. Any party receiving the sealed filing must not disclose the pro-
12 tected information.

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